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April 18, 2024

VIA ELECTRONIC MAIL AND ECF FILING

Honorable Paul A. Engelmayer
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Jane Street Group LLC v. Millennium Management LLC*, 24 C 2783 (PAE),
MOTION TO SEAL RESPONSIVE PAPERS PURSUANT TO COURT ORDER

Dear Judge Engelmayer:

We represent Defendant Millennium Management LLC (“Millennium”) in the above-referenced action. Pursuant to the Court’s April 17, 2024 Order to Show Cause, we write to request permission to seal certain materials that potentially contain the parties’ proprietary, commercially sensitive, or trade secret information in (1) Millennium’s letter-brief opposing Jane Street’s request for a temporary restraining order or preliminary injunctive relief, and (2) the Asmar Declaration attached thereto.

In its April 17, 2024 Order to Show Cause, the Court found “good cause for the sealed documents supporting this order to be designated ‘Highly Confidential’ / ‘Attorney’s Eyes & Client Representative Only’ pending entry of an appropriate protective order that protects any confidential information, trade secrets, or intellectual property exchanged between the parties.” Millennium disputes that Jane Street’s papers contain any trade-secret information or that Jane Street has articulated a viable trade-secret misappropriation theory. Millennium, however, requests that its papers be filed under seal consistent with the Court’s Order, since the scope of information in Millennium’s responsive papers is coextensive with the information the Court found good cause to seal, including potentially competitively sensitive information. Millennium will confer with Jane Street to provide reasonable redactions to these documents by Sunday, April 21.

Respectfully submitted,

/s/ Andrew J. Levander

Andrew J. Levander